

UNITED STATES DISTRICT COURT

for the
Western District of Washington

In the Matter of the Search of
*(Briefly describe the property to be searched
 or identify the person by name and address)*
 Meta Platforms, Inc (Instagram) Subject Account,
 more fully described in Attachment A

Case No. MJ23-117

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property *(identify the person or describe the property to be searched and give its location)*:

SUBJECT ACCOUNT, more fully described in Attachment A, incorporated herein by reference.

located in the Northern District of California, there is now concealed *(identify the person or describe the property to be seized)*:

See Attachment B, incorporated herein by reference.

The basis for the search under Fed. R. Crim. P. 41(c) is *(check one or more)*:

- ☒ evidence of a crime;
☐ contraband, fruits of crime, or other items illegally possessed;
☒ property designed for use, intended for use, or used in committing a crime;
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section

18 U.S.C. §§ 1591

Offense Description

Sex trafficking of children or through force, fraud, and coercion.

The application is based on these facts:

- ☒ See Affidavit of FBI Special Agent Zachary Hippe, continued on the attached sheet.

☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Pursuant to Fed. R. Crim. P. 4.1, this warrant is presented: ☒ by reliable electronic means; or: ☐ telephonically recorded.

Applicant's signature

Zachary Hippe, FBI Special Agent

Printed name and title

- ☐ The foregoing affidavit was sworn to before me and signed in my presence, or
☒ The above-named agent provided a sworn statement attesting to the truth of the foregoing affidavit by telephone.

Date: 03/10/2023

Judge's signature

City and state: Seattle, Washington

S. Kate Vaughan, United States Magistrate Judge

Printed name and title

1 probable cause for the requested warrant and does not set forth all of my knowledge
2 about this matter.

3 **IDENTIFICATION OF THE SUBJECT ACCOUNTS TO BE SEARCHED**

4 4. I am submitting this affidavit in support of an application under Rule 41 of
5 the Federal Rules of Criminal Procedure for a warrant for the following Instagram
6 account:

- 7 • Account ID Instagram: https://www.instagram.com/shotta_pistol34
8 instagram ID 8287570895.

9 (hereafter referenced as "SUBJECT ACCOUNT"). The account is an Instagram account
10 for the target of this investigation PATRICK PARKER, who uses the Instagram handle
11 "shotta_pistol34." Law enforcement received information regarding the above account
12 during the course of the investigation as set forth below.

13 5. The above user ID identifies an Instagram account stored at premises
14 owned, maintained, controlled, or operated by Meta Platforms ("Meta"), a social
15 networking company headquartered in Menlo Park, California. The information to be
16 searched is described in Attachment A. This affidavit is made in support of an
17 application for a search warrant under 18 U.S.C. §§ 2703(a), 2703(b)(1)(A), and
18 2703(c)(1)(A) to require Meta to disclose to the government copies of the information
19 (including the content of communications) further described in Section I of Attachment
20 B. Upon receipt of the information described in Section I of Attachment B, government-
21 authorized persons will review that information to locate the items described in Section II
22 of Attachment B.

23 6. As discussed below, there is probable cause to believe that the SUBJECT
24 ACCOUNT was utilized by PARKER to violate Title 18, United States Code, Section
25 1591 (Sex Trafficking of a Minor and through Force, Fraud and Coercion), and fruits of
26 violations of that offense, which are described in Attachment B.

27 7. This Affidavit is being presented electronically pursuant to Local Criminal
28 Rule CrR 41(d)(3).

JURISDICTION

8. This Court has jurisdiction to issue the requested warrant because it is “a court of competent jurisdiction” as defined by 18 U.S.C. § 2711. 18 U.S.C. §§ 2703(a), (b)(1)(A), & (c)(1)(A). Specifically, the Court is “a district court of the United States that has jurisdiction over the offense being investigated.” 18 U.S.C. § 2711(3)(A)(i).]

SUMMARY OF PROBABLE CAUSE

A. Background of Investigation

9. On August 6, 2022, agents and professional staff from the FBI Seattle Crimes Against Children squad, with the assistance of federal, state and local law enforcement partners, conducted an operation to locate and recover juvenile and adult victims of human trafficking. T.M., a known sex trafficking victim, was encountered and provided FBI with permission to perform a consent search of both cell phones in her possession.

10. T.M.’s phone contained two contacts, both of which were identified as “\$hotta ‘Tha Reason’ Pi\$tol,” and both of which listed the SUBJECT ACCOUNT as a means of contact. A review of the communications between the SUBJECT ACCOUNT and T.M.’s phone included chats and screenshots indicating that the SUBJECT ACCOUNT was being utilized to threaten T.M. into engaging in commercial sex. One of these contacts occurred while T.M. was still a minor.

11. Agents reviewed the contents of T.M.’s cellphone bearing IMEI 358891501482624 and located an Instagram chat between T.M. and the SUBJECT ACCOUNT dated July 7, 2022. In this chat T.M. stated:

How are you my Nigga you go all day with out talkin to me or checkin if I need some, I give you my money then you tell me you don’t have shit of mine how are we a team when I’m giving it to you n I suppadly don’t have shit what am I hoeing myself out for nothing? When we got together you told me I was gonna be able to see some of my money in that you were going to spoil mean to me so good I haven’t seen or got anything why am I doin this to myself? You don’t love on me or make me feel cared about you get mad at me don’t care when I’m telling you how I’m feeling about our relationship I couldn’t even get 100 for some hair products n money on me

1 to buy myself food or weed small shit I shouldn't feel bad for askin when
 2 ur supposed to provide me with everything reason why I hand you my trap
 3 every night, I really wanted to work shit out with you I've tried n tried but
 4 you ain't tried to work nothing out with me at all tell me you don't care n
 I'm trippen you don't care how I feel

5 I am aware from my training and experience that a "trap" refers to the money a sex
 6 trafficking victim earns through commercial sexual activities. I am also aware that
 7 traffickers will keep all money earned by victims to ensure they remain subservient, and
 8 only providing them with money or resources as the trafficker sees fit. In this exchange,
 9 T.M. bemoans the fact that she had provided PARKER with all of the money she earned
 10 through commercial sex and that he would not give her enough money to buy hygiene
 11 products or food, thus leaving her helpless, and also laments that her "hoeing"
 12 (commercial sex work) was for nothing since he keeps all of the money. I am aware from
 13 my training and experience that this a common tactic used by traffickers to control and
 14 manipulate their victims.

15 12. When reviewing T.M.'s cell phone bearing IMEI 358891501482624,
 16 agents found multiple screenshots of an Instagram conversation between T.M. and
 17 PARKER. Below are some excerpts of this text conversation:

18
 19 PARKER: I know everywhere to find you n please choose up so I don't
 20 gotta wait so long I'll just work yo Nigga n you Don't matter like I said I'm
 done talking if I'm not receiving my payments every night you sad.

21
 22 T.M.: Why would I wanna give you anything you don't make me happy
 23 you don't make me feel love you're not doing anything that's helping me I
 24 never used you like I left you peacefully n you left me grimey please just
 leave me alone

25
 26 PARKER: Alright bitch watch I tried to fw you n do right by you but you
 27 just left me on read so now you owe no matter what so think I'm playing n
 28 you won't have any teeth watch I'm not leaving this state till I have what I
 said from you so think you big bad if you want that's why you been getting
 done dirty feelin yourself When you could've been good token care of now
 w

1 T.M.: I never left you on read wyf

2 PARKER: You have no choice Bet I'm done talking I said what I said bitch

3
4 T.M.: give me no time to respond can you calm down please Like it's not
5 this stupid Serious*

6 PARKER: Bet I'm dead ass watch

7 T.M: You've already left me Shity can you just leave me alone Please

8
9 PARKER: I'm done talking butch Lmk when I'm pickin up my money
10 tonight or it'll be a different kind of visit

11 13. I know from my training and experience that "choose up" refers to the fee
12 that a trafficker requires his victims to pay before they leave him and move on to a new
13 pimp. I am also aware that sex trafficking victims are required to provide the money they
14 earn through commercial sex to their trafficker at the end of each day. Traffickers also
15 maintain very tight control over their victims and can take leaving messages unread as the
16 victim being rebellious. In this exchange, T.M. is stating that she left the SUBJECT
17 ACCOUNT holder peacefully and does not owe him anything, to which the SUBJECT
18 ACCOUNT replies that he will break T.M.'s teeth if she does not pay him every night
19 ("I'm done talking if I'm not receiving my payments every night you sad" and (think I'm
20 playin and you wont have any teeth"). He further states that he will meet T.M. tonight to
21 get his money and if she does not have they money, he will beat her/break her teeth out.

22 Another exchange reads:

23 PARKER: It's not but I see you just feel like you just bout just disrespect
24 me n basically leave me on read So since you not tryna run it up wot me
25 now like I said I need mine Think I'm playing all yo teeth gone be gone
Gone be great at suckin dick

26 T.M.: Nobody disrespected you what am I supposed to say back to that I
27 was trying to see what I wanted to say I already ran it up for you.
28

1 PARKER: I literally told you we can move on do better But clearly you feel
2 like sim else So I said what I said

3 T.M.: So why are you coming at me threatening me you've been doing
4 your own thing.

5 PARKER: Think I'm playing

6 T.M.: I haven't bothered you since I got my clothes back..

7 PARKER: I been hitting licks still on same shit Bet like I said I need Mines
8 So do what you want

9 T.M: You already got 10 from me
10

11 PARKER: Just know I'm not a talker I never got shit from you So butch
12 lmk when I'm pickin up my trap or it's bad.

13 I know from my training and experience that traffickers maintain extremely tight control
14 over their victims. This can often manifest in demanding that victims read and respond to
15 any messages sent by the trafficker immediately. In this exchange, PARKER states that
16 T.M. did not respond to his message quick enough and still had not paid him so he would
17 break all of her teeth out. T.M. states that she had already paid him \$10,000 and has not
18 bothered him since retrieving her clothes from him. He states that he is not bluffing about
19 hurting her ("not a talker") and that she needs to let him know when he can pick up his
20 money/"trap." He also refers to "hitting licks," which I am aware refers to engaging in
21 criminal activity.

22 14. Another exchange reads:

23 PARKER: I tried to work wit you n make you happy But it's good I need
24 mines now it's over I need my ten before you can do your own thing Period
25 Think I'm playing watch when I see you You'll be better off workin for
26 them days to get me out yo life But till then it's over Watch If I don't get
27 my bread ima show you how dead ass I am"

28 (Note: when T.M. does not respond, PARKER sends another text at
11:08 p.m.)

1 Alright I see you wanna take the dumb route instead of staying pretty
 2 getting my money n getting me out yo life instead of getting skint n beat
 3 every time you touch sim

4 As noted above, I am aware that traffickers may charge their victims an “exit fee” or
 5 “chose up” fee in order for them to leave the trafficker. In this series of messages sent to
 6 T.M., PARKER states that she must pay him \$10,000 as an exit fee (“I need my ten
 7 before you can do your own thing Period”). When T.M. fails to respond quickly enough,
 8 PARKER states that he will beat T.M. and take her money any time she makes some
 9 (“getting skint n beat every time you touch sim”).

10 15. Another exchange reads:

11 PARKER: Not goin back n forth lmk when you ready

12 T.M.: Like you already left me with nothing

13 PARKER: If you choose it will just be easier for me to skin you n yo weak
 14 add niggas Nobody in Seattle want smoke wit me you clearly know that So
 15 go choose so I can get my money quicker

16 T.M.: This is crazyyy Please just leave me alone

17 PARKER: Bet Just run up my ten so I can

18 T.M.: Already done skinned me for 10 (the message cuts off here)

19
 20 Based on the above verbatim exchange and my training and experience, I interpret this
 21 exchange as PARKER threatening T.M. if she does not provide him with \$10,000 (“10”
 22 refers to \$10,000). PARKER then states that it will be easy to rob T.M. since everyone in
 23 Seattle will know that she owes him money. T.M. states that PARKER has already stolen
 24 \$10,000 from her.

25 16. Another exchange reads:

26 T.M.: So whatever I make ain’t yours

27 PARKER: You dumb thinkin I’m not getting what I said Bet You good
 28

1 T.M.: I paid for everything that come wit myself it's crazy you claim I used
2 you in reality you used me I paid for my ticket I paid for gas back from cali
3 like wtf would I use you for ? really showin ur true colors threatening me n
all this shit

4 PARKER: Don't say I ain't try n let you chose smooth route I said what I
5 said bitch You getting skint everyday till I get what I said o need before
6 you can move on Bitch like I said you not done till I say

7 Based on my training and experience, this exchange involves PARKER telling T.M. that
8 she needs to pay him. When T.M. points out that she had paid for all of her expenses
9 herself, PARKER replies that he will beat T.M. every day until he gets his \$10,000 exit
10 fee ("You getting skint everyday until I get what I need before you can move on"). I am
11 aware that another method of control traffickers utilize is to maintain strict control over
12 their victims schedules or ability to quit sex work ("Bitch you not done till I say").

13 17. Another exchange reads:

14 T.M.: Cause someone told me that

15 PARKER: I don't even talk like that Idc bitch I need my bread

16 T.M.: We'll ion got shi you got it all already what more you want

17 PARKER: Alright bitch I'm bout walk up n work you I'm staring dead at
18 you

19 T.M.: What? I'm no where outside so how you lookin at me where am I
20 then?

21 PARKER: You was just bent over slippin Its good hit that blade I'm on yo
22 ass

23 T.M.: ?

24 PARKER: Ion know who you think I am

25 T.M.: Not even on the blade rn smoked
26
27
28

1 PARKER: No Nigga can save you Why you listening to Niggas cappin
2 That been yo problem It's good Good luck

3 T.M.: Please leave me alone

4 PARKER: I see you been having my name in yo broke ass dirty ass mouth
5 butch you got my money yet you got few more days just cuz I know how
6 broke you really are but hurry up for I get real impatient

7 I am aware that traffickers will coerce victims they deem to be non-compliant by
8 threatening them with physical violence and stating that they are always being watched.
9 In this exchange, PARKER threatens T.M. and states that he is currently watching her
10 and will attack her if she does not immediately comply. T.M. insists that she had paid for
11 everything herself and thus does not owe PARKER anything. T.M. further states that she
12 is not on "the blade" right now so PARKER must be lying about currently watching her.
13 I am aware that the term
14 "blade" is a colloquial term that refers to an area where open air sex work is conducted.
15 PARKER responds that since he knows how broke T.M. is, she has a few more days to
16 get him is \$10,000 but that she had better hurry up.

17 18. Contact between T.M. and PARKER was found dating back to May 24,
18 2022, when T.M. was still a minor. This contact shows T.M. had a conversation with the
19 SUBJECT ACCOUNT on May 24, 2022, but does not show the content of the
20 conversation.

21 19. PARKER also appears to be attempting to get T.M. to recruit others to
22 work for him. In one screenshot, PARKER sends several pictures of himself holding a
23 large stack of money and states:

24 PARKER: (sent pictures of himself holding money) Show that bitch that.
25 Broke ass bitch think 1000 sun to me that' shit pennies to a real boss.

26 T.M.: I'm not even cool with her right now

27 Based on my training and experience, I know that traffickers will often use victims they
28 are currently exploiting to recruit new victims. One popular method is for the trafficker to

1 provide his victims with pictures of the trafficker displaying signs of wealth, such as
2 money, vehicles, or jewelry, in order to entice other potential victims by showing how
3 successful the trafficker is and how much “better” things would be working for them. In
4 this instance, PARKER states that \$1,000 is nothing to a successful trafficker and sends
5 multiple pictures of himself displaying a stack of cash to the camera to pass on to the
6 potential recruit.

7 **BACKGROUND REGARDING INSTAGRAM**

8 20. Instagram is a service owned by Meta. Specifically, Instagram is a free-
9 access social networking service, accessible through its website and its mobile
10 application, that allows subscribers to acquire and use Instagram accounts, like the
11 SUBJECT ACCOUNT listed in Attachment A, through which users can share messages,
12 multimedia, and other information with other Instagram users and the general public.

13 21. Meta collects basic contact and personal identifying information from users
14 during the Instagram registration process. This information, which can later be changed
15 by the user, may include the user’s full name, birth date, gender, contact e-mail
16 addresses, physical address (including city, state, and zip code), telephone numbers,
17 credit card or bank account number, and other personal identifiers. Meta keeps records of
18 changes made to this information.

19 22. Meta also collects and retains information about how each user accesses
20 and uses Instagram. This includes information about the Internet Protocol (“IP”)
21 addresses used to create and use an account, unique identifiers and other information
22 about devices and web browsers used to access an account, and session times and
23 durations.

24 23. Each Instagram account is identified by a unique username chosen by the
25 user. Users can change their usernames whenever they choose but no two users can have
26 the same usernames at the same time. Instagram users can create multiple accounts and,
27 if “added” to the primary account, can switch between the associated accounts on a
28 device without having to repeatedly log-in and log-out.

1 24. Instagram users can also connect their Instagram and Facebook accounts to
2 utilize certain cross-platform features, and multiple Instagram accounts can be connected
3 to a single Facebook account. Instagram accounts can also be connected to certain third-
4 party websites and mobile apps for similar functionality. For example, an Instagram user
5 can “tweet” an image uploaded to Instagram to a connected Twitter account or post it to a
6 connected Facebook account, or transfer an image from Instagram to a connected image
7 printing service. Meta maintains records of changed Instagram usernames, associated
8 Instagram accounts, and previous and current connections with accounts on Facebook
9 and third-party websites and mobile apps.

10 25. Instagram users can “follow” other users to receive updates about their
11 posts and to gain access that might otherwise be restricted by privacy settings (for
12 example, users can choose whether their posts are visible to anyone or only to their
13 followers). Users can also “block” other users from viewing their posts and searching for
14 their account, “mute” users to avoid seeing their posts, and “restrict” users to hide certain
15 activity and prescreen their comments. Instagram also allows users to create a “close
16 friends list” for targeting certain communications and activities to a subset of followers.

17 26. Users have several ways to search for friends and associates to follow on
18 Instagram, such as by allowing Facebook to access the contact lists on their devices to
19 identify which contacts are Instagram users. Meta retains this contact data unless deleted
20 by the user and periodically syncs with the user’s devices to capture changes and
21 additions. Users can similarly allow Facebook to search an associated Facebook account
22 for friends who are also Instagram users. Users can also manually search for friends or
23 associates.

24 27. Each Instagram user has a profile page where certain content they create
25 and share (“posts”) can be viewed either by the general public or only by the user’s
26 followers, depending on privacy settings. Users can customize their profile by adding
27 their name, a photo, a short biography (“Bio”), and a website address.
28

1 28. One of Instagram’s primary features is the ability to create, edit, share, and
2 interact with photos and short videos. Users can upload photos or videos taken with or
3 stored on their devices, to which they can apply filters and other visual effects, add a
4 caption, enter the usernames of other users (“tag”), or add a location. These appear as
5 posts on the user’s profile. Users can remove posts from their profiles by deleting or
6 archiving them. Archived posts can be reposted because, unlike deleted posts, they
7 remain on Meta’s servers.

8 29. Users can interact with posts by liking them, adding or replying to
9 comments, or sharing them within or outside of Instagram. Users receive notification
10 when they are tagged in a post by its creator or mentioned in a comment (users can
11 “mention” others by adding their username to a comment along with an “@”). An
12 Instagram post created by one user may appear on the profiles or feeds of other users
13 depending on a number of factors, including privacy settings and which users were
14 tagged or mentioned.

15 30. An Instagram “story” is similar to a post but can be viewed by other users
16 for only 24 hours. Stories are automatically saved to the creator’s “Stories Archive” and
17 remain on Meta’s servers unless manually deleted. The usernames of those who viewed
18 a story are visible to the story’s creator until 48 hours after the story was posted.

19 31. Instagram allows users to broadcast live video from their profiles. Viewers
20 can like and add comments to the video while it is live, but the video and any user
21 interactions are removed from Instagram upon completion unless the creator chooses to
22 send the video to IGTV, Instagram’s long-form video app.

23 32. Instagram Direct, Instagram’s messaging service, allows users to send
24 private messages to select individuals or groups. These messages may include text,
25 photos, videos, posts, videos, profiles, and other information. Participants to a group
26 conversation can name the group and send invitations to others to join. Instagram users
27 can send individual or group messages with “disappearing” photos or videos that can
28 only be viewed by recipients once or twice, depending on settings. Senders can’t view

1 their disappearing messages after they are sent but do have access to each message's
2 status, which indicates whether it was delivered, opened, or replayed, and if the recipient
3 took a screenshot. Instagram Direct also enables users to video chat with each other
4 directly or in groups.

5 33. Instagram offers services such as Instagram Checkout and Facebook Pay
6 for users to make purchases, donate money, and conduct other financial transactions
7 within the Instagram platform as well as on Facebook and other associated websites and
8 apps. Instagram collects and retains payment information, billing records, and
9 transactional and other information when these services are utilized.

10 34. Instagram has a search function which allows users to search for accounts
11 by username, user activity by location, and user activity by hashtag. Hashtags, which are
12 topical words or phrases preceded by a hash sign (#), can be added to posts to make them
13 more easily searchable and can be "followed" to generate related updates from Instagram.
14 Meta retains records of a user's search history and followed hashtags.

15 35. Meta collects and retains location information relating to the use of an
16 Instagram account, including user-entered location tags and location information used by
17 Meta to personalize and target advertisements.

18 36. Meta uses information it gathers from its platforms and other sources about
19 the demographics, interests, actions, and connections of its users to select and personalize
20 ads, offers, and other sponsored content. Meta maintains related records for Instagram
21 users, including information about their perceived ad topic preferences, interactions with
22 ads, and advertising identifiers. This data can provide insights into a user's identity and
23 activities, and it can also reveal potential sources of additional evidence.

24 37. In some cases, Instagram users may communicate directly with Meta about
25 issues relating to their accounts, such as technical problems, billing inquiries, or
26 complaints from other users. Social networking providers like Meta typically retain
27 records about such communications, including records of contacts between the user and
28

1 the provider's support services, as well as records of any actions taken by the provider or
2 user as a result of the communications.

3 38. For each Instagram user, Meta collects and retains the content and other
4 records described above, sometimes even after it is changed by the user (including
5 usernames, phone numbers, email addresses, full names, privacy settings, email
6 addresses, and profile bios and links).

7 **KNOWLEDGE REGARDING USE OF INSTAGRAM ACCOUNTS AS**
8 **INSTRUMENTALITIES OF THE CRIME**

9 39. The use of an Instagram account to facilitate sex trafficking and interstate
10 transportation for the purpose of prostitution is not unusual. Through my investigative
11 experience, and based upon training and conversations with other law enforcement
12 officers involved in sex trafficking/prostitution investigations, I am aware that persons
13 involved in prostitution and sex trafficking often use social networking websites,
14 including Instagram, as a tool or instrumentality in committing their criminal activity.
15 Specifically, pimps and sex traffickers often use Instagram to identify potential recruits,
16 to communicate with these recruits via Instagram direct messaging or posts on a victim's
17 "wall," and to keep track of their victims and their whereabouts.

18 40. I am also aware from my training and experience that pimps and sex
19 traffickers will often take pictures of the females working for them and post these
20 pictures on their Instagram account. I am also aware from my training and experience
21 that pimps and sex traffickers will often transport their victims to different cities and
22 states to work as prostitutes. In such situations, pimps and sex traffickers will sometimes
23 post on their Instagram accounts about the locations where they are visiting and how
24 much money they are making at these locations.

25 41. I am also aware from my training and experience that sex traffickers will
26 often use the Internet to identify and recruit potential victims. In my experience,
27 traffickers will often utilize social media websites such as Instagram to either identify
28 individuals who might be vulnerable to their coercion and exploitation.

42. Based upon the information set forth above, I believe that the SUBJECT ACCOUNT is an instrument of Sex Trafficking of a Minor and through Force, Fraud, and Coercion, in violation of Title 18, United States Code, Section 1591, and is permeated with evidence of these crimes. A search of this account is needed to identify other potential victims who may have been exploited and view the conversations discussed above in their entirety.

43. Based upon the information set forth above, I believe that the SUBJECT ACCOUNT will contains evidence, instrumentalities, contraband, and fruits of the crime of Title 18, United States Code, Section 1591 (Sex Trafficking of a Minor and through Force, Fraud and Coercion).

POTENTIAL RELEVANCE OF DATA FROM INSTAGRAM ACCOUNTS

44. In my training and experience, evidence of who was using Instagram and from where, and evidence related to criminal activity of the kind described above, may be found in the files and records described above. This evidence may establish the “who, what, why, when, where, and how” of the criminal conduct under investigation, thus enabling the United States to establish and prove each element or, alternatively, to exclude the innocent from further suspicion.

45. For example, the stored communications and files connected to the SUBJECT ACCOUNT may provide direct evidence of the offenses under investigation. Based on my training and experience, instant messages, emails, voicemails, photos, videos, and documents are often created and used in furtherance of criminal activity, including to communicate and facilitate the offenses under investigation.

46. Account activity may also provide relevant insight into the account owner’s state of mind as it relates to the offenses under investigation. For example, information on the account may indicate the owner’s motive and intent to commit a crime (e.g., information indicating a plan to commit a crime), or consciousness of guilt (e.g., deleting account information in an effort to conceal evidence from law enforcement).

1 47. Stored communications including Instagram direct messages not only may
2 contain communications relating to crimes, but also help identify and locate the
3 participants in those crimes. Group lists and friend lists may help identify co-
4 conspirators. Similarly, photographs and videos may help identify and locate the account
5 holder and any co-conspirators. Search and browsing history can also be extremely
6 useful in identifying those using anonymous online accounts and may also constitute
7 direct evidence of the crime of labor trafficking or money laundering to the extent the
8 browsing history or search history might include searches and browsing history related to
9 worksites or attempts to recruit potential victims or conducting financial transactions with
10 the proceeds of forced labor.

11 48. With respect to this case, I anticipate that the SUBJECT ACCOUNT may
12 contain photographs that may establish the account owner's involvement in the crimes set
13 forth above, as well as communications between the SUBJECT ACCOUNT and co-
14 conspirators and/or victims of his crimes. Therefore, the computers of Meta are likely to
15 contain all the material described above, including stored electronic communications and
16 information concerning subscribers and their use of Instagram, such as account access
17 information, transaction information, and other account information.

18 **INFORMATION TO BE SEARCHED AND THINGS TO BE SEIZED**

19 49. I anticipate executing this warrant under the Electronic Communications
20 Privacy Act, in particular 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A), by
21 using the warrant to require Meta to disclose to the government copies of the records and
22 other information (including the content of communications) particularly described in
23 Section I of Attachment B. Upon receipt of the information described in Section I of
24 Attachment B, government-authorized persons will review that information to locate the
25 items described in Section II of Attachment B.

26 **CONCLUSION**

27 50. Based on the foregoing, there is probable cause to believe that the
28 SUBJECT ACCOUNT, more particularly described in Attachment A, contain evidence

1 and instrumentalities of the crime of Title 18, United States Code, Section 1591 (Sex
2 Trafficking of a Minor and through Force, Fraud and Coercion), as described in
3 Attachment B.

4 51. Pursuant to 18 U.S.C. § 2703(g), the presence of a law enforcement officer
5 is not required for the service or execution of this warrant.

6 52. The government will execute this warrant by serving the warrant on Meta.
7 Because Meta employees will compile the requested records at a time convenient to
8 them, reasonable cause exists to permit the execution of the requested warrant at any time
9 in the day or night.


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REQUEST FOR SEALING AND NON-DISCLOSURE

53. I further request that the Court order that all papers in support of this application, including the affidavit and search warrant, be sealed until further order of the Court and that the Court issue an order prohibiting Facebook from disclosing the execution of this warrant to the account holder. These warrant documents discuss an ongoing investigation, the full scope and details of which are not known to the primary target of the investigation. Evidence obtained through this investigation, described in greater detail above, suggests that the PATRICK PARKER may be involved in sex trafficking through force, fraud, or coercion, or sex trafficking of a minor. Further, the Facebook records sought through this investigation may lead to additional targets, such as co-conspirators and accomplices who facilitated involvement in the above-described crimes. Accordingly, there is good cause to seal these documents because their premature disclosure may give the target and co-conspirators an opportunity to flee from prosecution, destroy or tamper with evidence, change patterns of behavior, or otherwise jeopardize the investigation.


ZACHARY T. HIPPE
Special Agent
Federal Bureau of Investigation

The above-named agent provided a sworn statement to the truth of the foregoing affidavit by telephone on 10th day of March, 2023.


S. KATE VAUGHAN
United States Magistrate Judge

ATTACHMENT A
ACCOUNTS TO BE SEARCHED

This warrant applies to information associated with the following Instagram account:

- Account ID Instagram: https://www.instagram.com/shotta_pistol34
instagram ID 8287570895.

that is stored at premises owned, maintained, controlled, or operated by Meta, a company headquartered in Menlo Park, California.

ATTACHMENT B

I. Information to be disclosed by Meta

To the extent that the information described in Attachment A is within the possession, custody, or control of Meta, including any messages, records, files, logs, or information that have been deleted but are still available to Meta, or have been preserved pursuant to a request made under 18 U.S.C. § 2703(f), Meta is required to disclose the following information to the government for the SUBJECT ACCOUNT listed in Attachment A:

a. All contact and personal identifying information, including: full name, user identification number, birth date, gender, contact e-mail addresses, Instagram passwords, Instagram security questions and answers, physical address (including city, state, and zip code), telephone numbers, screen names, websites, and other personal identifiers;

b. All activity logs for the account and all other documents showing the user's posts and other Instagram activities from January 1, 2022, to present;

c. All photos uploaded by that user ID and all photos uploaded by any user that have that user tagged in them from January 1, 2022, to present, including Exchangeable Image File ("EXIF") data and any other metadata associated with those photos and videos;

d. All profile information; News Feed information; status updates; links to videos, photographs, articles, and other items; Notes; Wall postings; friend lists, including the friends' Instagram user identification numbers; groups and networks of which the user is a member, including the groups' Instagram group identification numbers; future and past event postings; rejected "Friend" requests; comments; gifts; pokes; tags; and information about the user's access and use of Meta applications, from January 1, 2022, to present;

e. All records or other information regarding the devices and internet browsers associated with, or used in connection with, that user ID, including the hardware model, operating system version, unique device identifiers, mobile network information, and user agent string, from January 1, 2022, to present;

1 f. All other records and contents of communications and messages
2 made or received by the user from January 1, 2022, to present, including all Messenger
3 activity, private messages, chat history, video calling and voice calling history, and
pending “Friend” requests;

4 g. All “check ins” and other location information from January 1, 2022,
5 to present;

6 h. All IP logs, including all records of the IP addresses that logged into
7 the account from January 1, 2022, to present;

8 i. All records of the account’s usage of the “Like” feature, including
9 all Instagram posts and all non-Instagram webpages and content that the user has “liked”
from January 1, 2022, to present;

10 j. All information about the Instagram pages that the account is or was
11 a “fan” of from January 1, 2022, to present;

12 k. All past and present lists of friends created by the account;

13 l. All records of Instagram searches performed by the account from
14 January 1, 2022, to present;

15 m. The types of service utilized by the user;

16 n. The length of service (including start date), the types of service
17 utilized by the user, and the means and source of any payments associated with the
18 service (including any credit card or bank account number);

19 o. All privacy settings and other account settings, including privacy
20 settings for individual Instagram posts and activities, and all records showing which
21 Instagram users have been blocked by the account;

22 p. All records pertaining to communications between Instagram and
23 any person regarding the user or the user’s Instagram account, including contacts with
support services and records of actions taken.

24 q. A list of any accounts linked to the SUBJECT ACCOUNT by
25 machine cookie.

26 Meta is hereby ordered to disclose the above information to the government within
27 **14 DAYS** of issuance of this warrant.
28

II. Information to be seized by the government

1. All information described above in Section I that constitutes fruits, contraband, evidence and instrumentalities of violations of Title 18, United States Code, Section 1591 (Sex Trafficking of a Minor and through Force, Fraud and Coercion), involving the SUBJECT ACCOUNT identified on Attachment A, information pertaining to the following matters:

a. Evidence that PATRICK PARKER or his co-conspirators are involved in prostitution, sex trafficking, drug trafficking; or illegal possession of firearms;

b. Evidence regarding the proceeds of the enumerated offenses;

c. IP log evidence, including all records of the IP addresses that logged into the account, and the dates and times such logins occurred, suggesting that PATRICK PARKER traveled within or outside the Western District of Washington to conduct prostitution or sex trafficking;

d. Evidence suggesting that PATRICK PARKER or his co-conspirators traveled within or outside the Western District of Washington to conduct prostitution or sex trafficking;

e. Evidence that PATRICK PARKER or his co-conspirators used Instagram to recruit individuals to prostitute for him, or to intimidate or tamper with victims or potential witnesses;

f. Evidence of the identities of and relationships between co-conspirators;

g. Evidence of who uses or accesses the subject account or who exercises in any way any dominion or control over the SUBJECT ACCOUNT;

h. Evidence of who communicated with the SUBJECT ACCOUNT, including records about their identities and whereabouts.

i. Log records, including IP address captures, associated with the specified account;

j. Subscriber records associated with the specified accounts, including 1) names, email addresses, and screen names; 2) physical addresses; 3) records of session

1 times and durations; 4) length of service (including start date) and types of services
2 utilized; 5) telephone or instrument number or other subscriber number or identity,
3 including any temporarily assigned network address such as internet protocol address,
4 media access card addresses, or any other unique device identifiers recorded by Google in
5 relation to the accounts; 6) account log files (login IP address, account activation IP
6 addresses, and IP address history); 7) detailed billing records/logs; 8) means and source
7 of payment; and 9) lists of all related accounts;

8 k. Records of communications between Meta and any person purporting to be
9 the account holder about issues relating to the SUBJECT ACCOUNT, such as technical
10 problems, billing inquiries, or complaints from other users about the specified account.
11 This to include records of contacts between the subscriber and the provider's support
12 services, as well as records of any actions taken by the provider or subscriber as a result
13 of the communications.

14 l. Information identifying accounts that are linked or associated with the
15 SUBJECT ACCOUNT.
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**CERTIFICATE OF AUTHENTICITY OF DOMESTIC BUSINESS
RECORDS PURSUANT TO FEDERAL RULE OF EVIDENCE 902(11)**

I, _____, attest, under penalties of perjury under the laws of the United States of America pursuant to 28 U.S.C. § 1746, that the information contained in this declaration is true and correct. I am employed by Meta Platforms, and my official title is _____. I am a custodian of records for Meta Platforms. I state that each of the records attached hereto is the original record or a true duplicate of the original record in the custody of Meta Platforms, and that I am the custodian of the attached records consisting of _____ (pages/CDs/kilobytes). I further state that:

a. all records attached to this certificate were made at or near the time of the occurrence of the matter set forth, by, or from information transmitted by, a person with knowledge of those matters;

b. such records were kept in the ordinary course of a regularly conducted business activity of Meta Platforms; and

c. such records were made by Meta Platforms as a regular practice.

I further state that this certification is intended to satisfy Rule 902(11) of the Federal Rules of Evidence.